451.01	Introduction
451.02	Applicable Statutes and Regulations
451.03	Policy Guidance
451.04	Interagency Agreements
451.05	Technical Guidance
451.06	Permits and Approvals
451.07	Non-Road Project Requirements
451.08	Exhibits

Key to Icon



Web site.*

451.01 Introduction

The potential impacts of transportation projects on land uses and land use plans typically are extensively reviewed during project development at local, regional, and state levels. Such review has gained visibility as a result of Washington's Growth Management Act (GMA) and federal mandates such as those applied through the Transportation Equity Act for the 21st Century (TEA-21) and federal grants. These programs have led to increased analysis of projected population, land use, and need for public infrastructure. Local jurisdictions, particularly cities and counties planning under the GMA, have adopted land use policies and capital facilities plans that must be taken into account during development of transportation projects. Most of these policies are in the process of being updated as the comprehensive plans are being updated. The update of comprehensive plans is on a staggered schedule.

(1) Summary of Requirements

The primary requirements for analysis of impacts on land use and land use plans are established in implementing regulations for NEPA, SEPA, and the GMA; the GMA's mandated Essential Public Facilities (EPF) review; and local codes.

NEPA and SEPA processes can be done concurrently; however, GMA mandates, linked to an EPF process, may require an extended timeline. Early coordination with local jurisdictions is essential for several reasons: to identify local conditions that could affect highway operations or future design; to obtain early buy-in and explore possible joint development projects, and to ensure sufficient time for extensive local review. Documentation of comments is essential in the circumstances where WSDOT would file an objection to local changes with the GMA Hearing Boards. The Hearing Boards expect early and continuous involvement that has been well documented.

^{*} Web sites and navigation referenced in this chapter are subject to change. For the most current links, please refer to the online version of the EPM, available through the ESO home page: http://www.wsdot.wa.gov/environment/

(2) Abbreviations and Acronyms

Abbreviations and acronyms used in this chapter are listed below. Others are found in the general list in **Appendix A**.

CFP Capital Facilities Plan

CTED Washington State Department of Community, Trade, and Economic Development

EPF Essential Public Facilities GMA Growth Management Act

HSS Highways of Statewide Significance

LOS Level of Service

MPO Metropolitan Planning Organization

PSRC Puget Sound Regional Council

RTPO Regional Transportation Planning Organization

(3) Glossary

See Appendix B for a general glossary of terms used in the EPM.

Concurrency – The requirement to have needed infrastructure (e.g. roads, sewers, water systems) in place or planned and funded within six years of permitting and development in the jurisdiction where the development is located. The concurrency process was established through the GMA.

Highways of Statewide Significance – RCW 47.05.022 designates these and sets standards. HSS and other facilities and services of statewide significance are essential public facilities.

Level of Service (LOS) – A tool for identifying the degree of capacity at which a public service or infrastructure operates. The most commonly used is the LOS A-F standard for capacity, volume, and delays at a traffic intersection, F being the worst congestion and delay time period.

Urban Growth Area – The identified boundary that allows for higher density and focused infrastructure development to control growth from "sprawling" into the identified rural and sensitive areas of local jurisdictions.

451.02 Applicable Statutes and Regulations

This section lists the primary statutes and regulations applicable to land use and growth issues. See **Appendix D** for a list of statutes referenced in the EPM. Permits and approvals required pursuant to these statutes are listed in **Section 451.06**.

(1) National Environmental Policy Act/State Environmental Policy Act

The National Environmental Policy Act (NEPA), 42 USC 4321 et seq., requires that all actions sponsored, funded, permitted, or approved by federal agencies undergo planning to ensure that environmental considerations such as impacts related to land use are given due weight in project decision-making. The State Environmental Policy Act (SEPA) mandates a similar procedure for state and local actions. Federal implementing regulations are at 23 CFR 771 (FHWA) and 40 CFR 1500-1508 (CEQ). State implementing regulations are in WAC 197-11 and WAC 468-12 (WSDOT). For details see Chapter 410 and Chapter 411.

(2) Growth Management Act (GMA)

The Washington State legislature adopted growth management legislation in 1990 and 1991, and it has adopted subsequent amendments. The Growth Management Act (GMA), RCW 36.70A.070, sets goals to guide planning in the larger, fastest growing counties and cities within those counties, and provides for a regional transportation planning program to be administered by WSDOT. The GMA requires fully planning counties and cities to:

- Adopt countywide planning policies.
- Work together to allocate the projected population within each county.
- Adopt local comprehensive plans, including a transportation element.
- Define urban growth areas and reevaluate every ten years.
- Ensure that development regulations are consistent with comprehensive plans.
- Establish a process for siting essential public facilities, which cannot be precluded.
- Designate natural resource lands (forest, agriculture, and mineral resources).
- Designate critical areas (wetlands, aquifer recharge areas, habitat, and flood prone and geologically hazardous areas).
- Include the best available science when developing policies and development regulations to protect the functions and values of critical areas.
- Give special consideration to conservation or protection measures to preserve or enhance anadromous fisheries.
- Review and revise, if needed, the comprehensive plan and development regulations every seven years to ensure they comply with GMA.

The applicability of these local plans and policies to WSDOT transportation projects is described below in **Section 451.03**. Permits required pursuant to implementing regulations are listed in **Section 451.06**.

The act is available on line at:

http://www.leg.wa.gov/RCW/index.cfm?fuseaction=chapterdigest&chapter=36.70A

(a) GMA Goals

The GMA identifies the following goals to guide counties and cities in developing comprehensive plans and development regulations:

- Preserve historic properties.
- Assure adequate public facilities and services at the time developments are completed (concurrency requirements).
- Provide for citizen participation and coordination between communities to resolve conflicts.
- Protect the environment and enhance the quality of life in Washington State.

- Retain open space, develop recreational opportunities, and increase access to natural resource lands and water.
- Preserve and enhance natural resource-based industries, including timber, agriculture, and fisheries.
- Provide timely and predictable processing of applications for state and local permits.
- Protect private property rights from arbitrary and discriminatory actions, to include just compensation for taking of private property for public use.
- Provide economic development consistent with adopted comprehensive plans; encourage growth in areas of need.
- Provide sufficient affordable housing of a variety of types and densities; preserve existing housing.
- Provide efficient transportation systems based on regional priorities and coordinated county and city plans.
- Reduce conversion of undeveloped land into sprawling development.
- Encourage development in urban areas where adequate public facilities and services exist or can be provided efficiently.

Later legislation added a 14th goal on shoreline management.

All fully planning counties under GMA are required to meet the following requirements.

- All counties are required to designate and protect critical areas and designate and protect natural resource lands. Every seven years local governments are to review their work in these areas to ensure it complies with GMA, including using best available science.
- All cities and counties with comprehensive plans are required to make their development regulations consistent with their comprehensive plans.
- Short plats and subdivisions may be approved only if adequate services are available.
- Any building permit application needs to supply evidence of adequate water supply.

(b) Regional Transportation Planning

The GMA authorizes local governments to create Regional Transportation Planning Organizations (RTPOs) to develop regional transportation plans and to coordinate transportation planning between local governments and the state. (See Chapter 230 for details.)

The act also provides for state grants to RTPOs, administered by WSDOT, and specifies these requirements:

- *Joint Planning* Regional planning processes must be integrated with WSDOT's planning program.
- Coordination between Regions WSDOT's planning program must ensure statewide coordination among the regional transportation plans produced by RTPOs.
- Development of Standards for Regional Transportation Planning

 In coordination with the RTPOs, WSDOT establishes the rules on
 the process and planning activities undertaken by the regional
 transportation planning program. All regionally significant
 transportation projects, whether state or locally funded, must be
 consistent with the adopted regional transportation plan.

WSDOT's GIS Workbench, a GIS interface, includes a data set of RTPOs in Washington, as well as other "Data Provided by Local Agencies", such as land use and land cover data and political and administrative boundaries data. Internal WSDOT users can access these and other data sets through the GIS Workbench. For information on how to access the Workbench, see:

http://www.wsdot.wa.gov/environment/envinfo/default.htm

For a list of current data sets, see WSDOT's web site:

http://www.wsdot.wa.gov/

Click on Maps & Data, then GIS Data Distribution Catalog.

Or by direct link:

http://www.wsdot.wa.gov/mapsdata/geodatacatalog/default.htm

(c) Projects Affecting Multiple Jurisdictions

Many major transportation projects affect multiple jurisdictions that may be concerned about how a project will affect economic development, fiscal resources, environmental resources, land use, and mobility of people and goods. The GMA encourages local governments affected by a major transportation project to consider the range of local, state, and federal requirements, and coordinate planning and regulatory decisions with other affected jurisdictions (RCW 36.70A.420). WSDOT works closely with affected jurisdictions on studies, permits, or other approvals required for major projects.

For counties and cities that are not required to fully plan under GMA, the above requirement does not apply. (See Section 451.03 for requirements applicable to all counties.) WSDOT project managers need to work with all counties and/or cities to review any applicable land use and/or transportation plans.

(3) 1991 Growth Strategies Act

The 1991 Growth Strategies Act (RCW 36.70A (as amended) is an update of the GMA. The Growth Strategies Act has a more direct impact on WSDOT operations, since it requires state agencies to comply with local comprehensive

plans and development regulations. The act defines some state transportation facilities as Essential Public Facilities (EPFs). These facilities can be subject to local conditions established by development regulations. The act requires local governments to develop a process for siting such facilities, and it prohibits local governments from precluding the siting of essential public facilities. Key provisions of the act are summarized below.

(a) State Agency Compliance

The act requires state agencies to comply with local government comprehensive plans and development regulations prepared under the act. In designated Growth Management Areas, WSDOT is only subject to development regulations, including critical area ordinance permits. Within the right-of-way, WSDOT is not subject to building and clearing/grading permits. Outside of the right-of-way, WSDOT is subject to these permits, for example for a building project at a maintenance facility.

(b) Siting of Essential Public Facilities

The act requires local governments to have a process for siting EPFs, including regional and state transportation facilities. The state Office of Financial Management must maintain a list of state EPFs that are required or likely to be built within the next six years. Local governments may not preclude the siting of these facilities. However, WSDOT must coordinate planning activities with local governments and comply with local development regulations.

(c) Growth Management Hearings Board

The legislation created three regional Growth Management Hearings Boards to hear and resolve growth management disputes. WSDOT has access to these boards to challenge a local comprehensive plan or development regulation, and local governments may use the boards to challenge WSDOT actions. However, if WSDOT has not commented on the process during the local jurisdiction's comment period, the agency cannot bring any challenges to the Hearing Boards. Therefore, any comments should be timely and well documented.

(d) State Agency Grants and Loans

According to RCW 43.17.040, state agencies must give preference to local governments that have adopted (or demonstrate substantial progress toward adopting) a comprehensive plan and development regulations as required by RCW 36.70A.040 when they review competing requests from local governments planning under the GMA for grants or loans to finance public facilities. This preference is not required in reviewing those requests and requests from local governments not planning under the GMA. Local comprehensive plans must include a Transportation Element, and countywide planning policies must give direction for siting public capital facilities of a countywide or statewide nature, including transportation facilities (see Section 451.03(2)(a)).

(4) Local Ordinances and Regulations

Many local government land use ordinances and regulations may affect the transportation system and specific projects. These include: zoning ordinances and development regulations, critical areas ordinances, and shoreline management master programs. WSDOT project managers will need to ascertain which such regulations may apply to their project. In cities and counties planning under the GMA, two regulations that may affect the transportation system and projects are summarized below.

(a) Concurrency

The GMA requires local governments to adopt ordinances that prohibit development unless necessary transportation improvements, identified in the Capital Facilities Element, are made "concurrent with" the development. "Concurrent with" is defined as "at the time of or committed to be made within six years." Local governments can devise a system for metering land use development to match their transportation capacity and transportation budget.

Transportation infrastructure identified in the Capital Facility Element is required to serve the community at an acceptable level. Concurrency requirements are identified through the level of service tool. Level of service (LOS) standards for streets and roads are adopted in the local Comprehensive Plan and implemented through development review and SEPA. Highways of statewide significance are excluded from the local concurrency requirements, except in counties comprised entirely of islands.

(b) Development Impact Fees

The GMA authorizes local governments to collect development impact fees to pay for public facilities, including roadways, and many jurisdictions have adopted ordinances imposing traffic or transportation impact fees for development proposals. The GMA requires specific "upfront" planning by the local government to document their adopted LOS standards, and establishes a standard process for collecting fees when a development will cause the LOS to drop below the local standard.

451.03 Policy Guidance

(1) Regional Transportation Plans

All 14 RTPOs in Washington have adopted regional transportation plans that are updated regularly. All WSDOT transportation projects should be consistent with these regional plans.

(2) County and City GMA-Related Plans and Policies

(a) Countywide Planning Policies

To ensure cooperation between neighboring jurisdictions, each county planning under GMA is required to adopt countywide planning policies, formulated with and agreed upon by each of the cities in the county. These policies are the framework of the county's overall growth management strategy. Multi-county planning policies are to be adopted by two or more

counties, each with a population of 450,000 or more, with contiguous urban areas; other counties may voluntarily adopt multi-county policies. This requirement applies to King, Pierce, and Snohomish counties.

Countywide planning policies are required to give direction for siting public capital facilities of a countywide or statewide nature, including transportation facilities and services of statewide significance as defined in RCW 47.06.140. WSDOT regional offices should participate in developing the transportation component of countywide planning policies, since state agencies must adhere to them once they are adopted.

(b) Urban Growth Areas

Counties that plan fully under the GMA must consult with cities and designate urban growth areas within which urban growth is to be contained. The boundary of an urban growth area may differ from the boundary of an urban area as defined by the FHWA in identifying an area to be served by a federally aided transportation project. (Such a project may constitute an essential public facility under the GMA.) Growth boundaries established under these processes may impact how WSDOT plans for improvements. For example, higher levels of access management may be needed in rural areas to discourage growth at urban densities.

(c) Natural Resource Lands and Critical Areas

Counties and cities are required by GMA to designate natural resource lands and critical areas to be protected through their plans, policies, and development regulations. Resource lands are defined as forest, agriculture, and mineral resource lands. Critical areas to be designated are:

- Wetlands
- Aquifer recharge areas
- Fish and wildlife habitat conservation areas
- Frequently flooded areas
- Geologically hazardous areas

Critical areas impacts are closely tied to wetland regulations, flood zone regulations, and other natural habitat area protection regulations. (See Sections 420.02, 432.02, 433.02, 436.02, and 437.02).

(d) Local Comprehensive Plans

Each county and city planning fully under the GMA must adopt a comprehensive plan consistent with countywide planning policies. Comprehensive plans designate urban and rural areas, natural resource lands, and critical areas. Comprehensive plans must include a Capital Facilities Plan (CFP), and the transportation element of the comprehensive plan may include a six- and twenty-year list of transportation and other facilities projects needed to implement the plan.

Local comprehensive plans are required to include the following elements: land use, housing, capital facilities, public utilities, rural areas (counties

only), and transportation. Elements mostly likely to affect transportation planning are:

- Land use element. This element designates the proposed general
 distribution of land use. It must include review of drainage and
 stormwater runoff and provide guidance to mitigate water pollution.
 The land use element provides the basis for infrastructure plans,
 including capital facilities, public utilities, and transportation.
 Environmental information related to designated critical areas may
 be included in this section.
- *Transportation element.* The transportation element must be consistent with the land use element. It must inventory the transportation system, establish level of service (LOS) standards, identify deficiencies, analyze transportation funding, and develop proposals to upgrade deficiencies. The inventory must include stateowned transportation facilities within the city or county boundaries (RCW 36.70A.070 (6)(iii)(a)).
 - The GMA requires that local jurisdictions identify transportation facilities and services of statewide significance in their local plans. The GMA authorizes a regional transportation planning process to improve coordination between local governments and the state.
- Capital facilities element. The capital facilities element is for public facilities, including transportation facilities, with a minimum cost of \$25,000 and expected useful life of at least 10 years. A capital facility element is created through an analysis of the need for additional facility capacity to serve current and future development. The financial part of the Capital Facility Element is a Capital Facility Plan (CFP) showing how facilities will be financed over a six-year time frame. The transportation section of CFP addresses concurrency and levels of service (RCW 36.70A210 (3)(a-h)).

Both the land use and transportation chapters in local comprehensive plans provide direct guidance for new transportation projects. WSDOT project managers should evaluate their project for consistency with countywide planning policies and local comprehensive plans. If a proposed transportation project is inconsistent, WSDOT should consult with the county and/or regional government staff to discuss policy differences and possible resolution of those differences. Under the GMA, state agencies must comply with local comprehensive plans and development regulations (RCW 36.70A.103); likewise local agencies should coordinate with WSDOT.

(3) Planning and Zoning (Jurisdictions Not Planning Fully under the GMA)
Cities and counties in the smaller, slower-growing areas of the state are not required to fully plan under the GMA. These jurisdictions are authorized to regulate land use under RCW 36.70. However, all counties in the state are required to designate and protect critical areas and natural resource lands.

WSDOT staff should familiarize themselves with any comprehensive land use plans, zoning and development regulations, and arterial plans these jurisdictions have adopted.

(4) Other Local Planning Policies

Neighborhood plans, subarea plans, special overlay zones, and downtown plans are among the other local documents that may contain additional policy direction or guidelines for transportation projects. They may require additional studies and/or mitigation, restrict access, require redesigning a road's function and design, require transfer of development rights, or regulate air rights to protect views.

451.04 Interagency Agreements

None. See **Appendix E** for an index of interagency agreements referenced in the EPM.

451.05 Technical Guidance

(1) WSDOT Discipline Report

The checklist in **Exhibit 451-1** is a guide to completing WSDOT's Land Use Discipline Report, which is used to prepare the land use section of Environmental Assessments (EAs), SEPA checklists, or Environmental Impact Statements (EISs). The discipline report should include a review of applicable local and regional land use plans, policies, and ordinances; a description of existing land use and zoning and development trends; potential impacts on land use resulting from the project, and construction impacts. Mitigation measures are normally not applicable.

A Land Use Discipline Report is needed for an EIS project when there is a reasonable probability that the project would have more than a moderate effect on land use in the project area. For example, a Discipline Report would be needed if the project would cause a substantial amount of growth of a particular type in an area where such growth is not planned, or if it would prevent a substantial amount of growth of a particular type in an area where such growth is planned, despite any proposed mitigation. For an EA project, a Land Use Discipline Report is needed when it is determined that the project may have more than a moderate effect on land use but further analysis is needed to establish whether there is a reasonable probability that such an effect will occur. Any rationale for determining that a full Discipline Report is not needed should be documented in a technical memo that is kept in the project file.

(2) FHWA Technical Advisory

FHWA's Technical Advisory T 6640.8A, *Guidance for Preparing and Processing Environmental and Section 4(f) Documents* (October 1987) gives guidelines for preparing environmental documents, including specific sections on land use and joint development measures.

Land use sections of EISs, EAs, and Section 4(f) documents should identify current development trends, and consistency of each alternative with relevant regional and local plans for land use, transportation, public facilities, housing, community services, and other areas. Secondary social, economic, and

environmental impacts of development induced by the project should be presented, making a distinction between planned and unplanned growth impacts.

A draft EIS should also identify and discuss joint development projects that could be undertaken by WSDOT in cooperation with a local jurisdiction or private party to preserve or enhance an affected community's social, economic, environmental, and visual values. This discussion may be presented separately or combined with the land use and/or social impacts presentations. The benefits to be derived, those who will benefit (communities, social groups), and the entities responsible for maintaining the measures should be identified (see also Section 457.05).

For details, see the "Land Use Impacts" and "Joint Development" sections of the technical advisory at:



http://www.fhwa.dot.gov/

Click on Legislation and Regulations, then FHWA Directives and Policy Memorandums, then FHWA Technical Advisories, then T6640.8A.

Or by direct link:



http://www.fhwa.dot.gov/legsregs/directives/techadvs/t664008a.htm

(3) FHWA Environmental Guidebook

FHWA's online Environmental Guidebook contains documents on community impact assessment that may be relevant to land use studies. Available at:



http://environment.fhwa.dot.gov/guidebook/index.htm

Washington State Department of Community, Trade and Economic Development (CTED) (4) CTED staff should be consulted for technical assistance on GMA-related issues. For information about other resources, see the CTED home page:



http://www.cted.wa.gov/

451.06 Permits and Approvals

Permits and approvals relating to Land Use, Land Use Plans, and Growth Management are addressed in the sections referenced below:

Federal

- Section 520.05 Archaeological Resource Protection Permit (federal and tribal lands)
- Section 520.13 Other Federal Approvals (Authorization for Use of Public Lands from Bureau of Land Management or U.S. Fish and Wildlife Service)

Tribal

Section 530.05 – Tribal law (similar to permits and approvals required by counties and cities)

State

- Section 540.16 Aquatic Lands Use Authorization
- Section 540.17 Easement over Public Land

- Section 540.18 Forest Practices Approval
- Section 540.19 Surface Mining Reclamation Permit
- Section 540.20 Survey Monument Removal Permit
- Section 540.22 Archaeological Excavation and Removal Permit

Local

- Section 550.02 Shoreline Permits
- Section 550.03 Floodplain Development Permit
- Section 550.04 Critical Areas Ordinance Compliance
- Section 550.05 Clearing and Grading Ordinances (outside right-of-way)
- Section 550.06 Land Use Permits (outside right-of-way)

451.07 Non-Road Project Requirements

Ferry, rail, airport, or non-motorized transport systems are generally subject to the same policies, procedures, or permits that apply to road systems.

(1) Ferry Facilities

Ferry terminals are often located near areas that provide natural harbors. These harbors can be attractive as sites for private marinas that could interfere with ferry operations. Washington State Ferries prefers to take proactive steps, such as working with local jurisdictions, to minimize the opportunities for private marina development that may pose navigational hazards.

(2) Aviation Facilities

Environmental documents on public-use airports must address land uses that may attract birds and other wildlife, which may create hazards on or near airports. These issues are addressed in the following Federal Aviation Administration (FAA) Advisory Circular: *Hazardous Wildlife Attractants on or Near Airports*, FAA Advisory Circular No. 150/5200-33, (May 1, 1997).

- Section 1 of the advisory circular describes types of hazardous wildlife attractants on or near airports, land use practices that attract wildlife, and siting criteria for airport projects.
- Section 2 provides information on land uses that are incompatible with safe airport operations. These include putrescible waste disposal operations, wastewater treatment facilities, and dredge spoil containment areas.
- Section 3 lists land uses that may be compatible with safe airport
 operations. These include: enclosed waste facilities, recycling centers,
 composting operations, ash disposal, construction and demolition debris
 landfills, water detention or retention ponds, landscaping, golf courses, and
 agricultural crops.
- Section 4 provides guidance on notifying the FAA about hazardous wildlife attractants, including FAA review of proposed land use changes.

The circular is online at FAA's web site:



Click on Regulations and Policies; then Advisory Circulars; then Airports; then 150/5200-33A under "Airport Safety—General".

Or by direct link:

http://www.faa.gov/arp/publications/acs/5200-33A.pdf

451.08 Exhibits

Exhibit 451-1 – Land Use Discipline Report Checklist.



Discipline Report Checklist Land Use

Project Name:					Job Number:			
Conta	ct Name	e:						
Date Received:					ate Rev	iewed:	Reviewer:	
(SAT	= Satisf	factory;]	INC =	Incom	plete; M	IS = Mi	ssing; N/A = Not Applicable)	
Answ	ers are 1	required	for qu	estions	which l	nave no	N/A box.	
I.	Studio	es and (Coordi	natior	າ			
(Refe	to 40 C	CFR Sec	tion 15	502.160	(c), 40 C	FR 150	6.2(d), and DOT 5610.1C Attachment 1.)	
Revie	ws of ci	ty and c	ounty l	land us	se plans,	arterial	street plans, land use codes, comprehensive ood plans.	
II.	Affect	ted Envi	ironm	ent				
Includ	•	• /					local plans for zoning, land use, recreational, ag the following descriptions or graphics:	
SAT	INC	MIS	N/A					
				A.	-	_	existing land use for the project area and the area influenced by the project.	
				B.		_	existing zoning.	
				C.	Appli	cable la	nd use plans and development trends.	
					1.		al plans or policies - including land use es related to air or water quality impacts.	
					2.	State	plans, if any.	
					3.	_	nal planning agency development and ortation plans.	
					4.	Trans	portation system plans of applicable agencies.	
					5.	Count	y and city plans:	
						a.	Land use plans (include map where available).	
						b.	Recreation area and open space plans.	
						c.	Shoreline master program.	
						d.	Zoning plans.	
						e	Critical areas	

III.	Impac	ts				
Consider land use changes caused by or reasonably foreseeable from increased accessibility or other project effects.						
SAT	INC	MIS	N/A			
				A.	Distribution of development among governing agencies and impact on their public services.	
				B.	Distribution of development between cities and suburbs.	
				C.	Amount and type of land required.	
				D.	Existing zoning and current use of real property to be acquired for right of way.	
				E.	Potential for joint or multiple use of right of way for utilities or other purposes, above, below, or beside the traveled lanes of the highway.	
				F.	Land use changes caused by changes in noise, air, water, and visual quality.	
				G.	Possible conflicts between proposed action and Indian land or other land use plans, policies, and controls (40 CFR Section 1502.16(c)). If there is conflict, describe the extent to which the proposed action will be reconciled with these plans (40 CFR Section 1506.2(d)), and/or reasons for proceeding without full reconciliation (DOT 5610.1C Attachment 1).	
				H.	Consistency with adopted transportation and development plans for the area and region.	
IV.	Mitiga	ition (N	ormall	y not a	pplicable.)	
SAT	INC	MIS	N/A			
				A.	Mitigation measures and commitments to offset adverse impacts (e.g., access changes or controls).	
				В.	Mitigation measures considered or available but not included, with reasons why.	

All impacts associated with construction of the project are to be addressed in a "Construction Activity Impacts" section of the EIS. Provide the following information, as appropriate, for inclusion in that section:						
SAT	INC	MIS	N/A			
				A.	Under Impacts , consider temporary impacts associated with construction.	
				B.	Under Mitigation (normally not applicable):	
					1. Mitigation measures and commitments during construction.	
					2. Mitigation measures considered or available but not included, with reasons why.	
VI.	Sumn	narv				
Summarize the analysis done and conclusions reached. The summary should include enough detail so that it can be included in the EIS with only minor modification. The summary should include:						
SAT	INC	MIS	N/A			
				A.	The objectives of the project.	
				B.	Current land use patterns.	
				C.	Impacts of all alternatives including the no-build alternative.	
				D.	Recommended mitigation.	
				E.	Comparison of alternatives based on impacts and cost effectiveness of mitigation.	
General Comments: _						

٧.

Construction Activity Impacts